


2008

Department of the Interior Sustainable Buildings Implementation Plan



LEED Gold - National Park Service Midwest Regional Office - Omaha, Nebraska - GSA Built-to-Suit Leased Space


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EXECUTIVE SUMMARY

This plan is the Department of the Interior (DOI) policy to implement the sustainable buildings requirements of *Executive Order 13423 – Strengthening Federal Environmental, Energy, and Transportation Management* (E.O. 13423) and its underlying statutory requirements. E.O. 13423 codified the Federal Leadership in High Performance and Sustainable Buildings Memorandum of Understanding (MOU) signed by DOI along with 20 federal agencies in January 2006. E.O. 13423 builds on the MOU by requiring that “(i) new construction and major renovation of agency buildings comply with the Guiding Principles for Federal Leadership in High Performance and Sustainable Buildings set forth in the Federal Leadership in High Performance and Sustainable Buildings Memorandum of Understanding (2006) [Guiding Principles], and (ii) 15 percent of the existing federal capital asset building inventory of the agency as of the end of fiscal year 2015 incorporates the sustainable practices in the Guiding Principles.”

The Secretary of the Interior states in a memorandum to all DOI officials signed April 4, 2007, “Our accomplishments to date provide an excellent foundation for us to intensify and broaden our efforts to meet the ambitious goals of the E.O. ... I expect the Department, as the Nation's premier conservation agency, to lead by example.”

Thus, DOI's sustainable buildings vision is:

DOI will be a government leader in meeting or exceeding E.O. 13423 requirements for incorporating the Guiding Principles for Federal Leadership in High Performance and Sustainable Buildings into DOI buildings.

To fulfill this challenging vision, DOI will use an interdisciplinary approach bringing together Subject Matter Experts from DOI's building management community. DOI will modify and improve current policy and practice in the following four areas: 1) design, construction, maintenance and operation of all new building construction and major rehabilitation meet the Guiding Principles and relevant statutory requirements; 2) existing buildings' maintenance and operation practices move toward compliance with the Guiding Principles; 3) ensure new leases comply with the Guiding Principles, and 4) unneeded real property assets are disposed as appropriate. DOI will track, measure and report compliance with E.O. 13423 requirements.

Created by the multi-disciplinary DOI Sustainable Buildings Implementation Team with representatives from each Bureau, this DOI Sustainable Buildings Implementation Plan (DOI Plan) is a living document that lays out roles and responsibilities, targets, milestones, and initiatives necessary to accomplish DOI's sustainable buildings vision. DOI will track performance on the Office of Management and Budget's (OMB) Environmental Stewardship Scorecard and the DOI Internal Scorecard and use results to continually improve this DOI Plan.

1.0 INTRODUCTION

1.1 Background

E.O. 13423 requires federal agencies to design, construct, and operate federal buildings in accordance with the Guiding Principles. This Plan outlines how DOI will ensure that: 1) design, construction, maintenance and operation of all new building construction and major rehabilitation meet the Guiding Principles and relevant statutory requirements; 2) existing buildings' maintenance and operation practices move toward compliance with the Guiding Principles; 3) ensure new leases comply with the Guiding Principles, and 4) unneeded real property assets are disposed as appropriate.

This plan incorporates the sustainable buildings requirements contained in the following three documents:

1. *Executive Order 13423 – Strengthening Federal Environmental, Energy, and Transportation Management* (E.O. 13423) signed by the President in January 2007. E.O. 13423 codified the Federal Leadership in High Performance and Sustainable Buildings Memorandum of Understanding signed by the US Department of the Interior (DOI) in January 2006 by requiring use of the Guiding Principles (Appendix 1).
2. *Instructions for Implementing Executive Order 13423 – Strengthening Federal Environmental, Energy, and Transportation Management* prepared by the Council for Environmental Quality and the Office of the Federal Environmental Executive (Appendix 2).
3. *Sustainable Buildings Implementation Plan Required Components* prepared by the Office of Management and Budget (OMB) (Appendix 3).

1.2 DOI Sustainable Buildings Vision

DOI will be a government leader in meeting or exceeding E.O. 13423 requirements for incorporating the Guiding Principles for Federal Leadership in High Performance and Sustainable Buildings into DOI buildings. To realize this vision, DOI will incorporate the Guiding Principles into at least 15% of DOI owned and leased building inventory by 2015.

1.3 DOI Owned and Delegated Lease Building Inventory

DOI's owned and delegated lease building inventory in the Federal Real Property Profile (FRPP) at the end of FY 2007 includes:

- 47,694 buildings with a total of 123,291,211 aggregate gross square feet;
- 1,994 buildings with a value greater than capital threshold of \$2,000,000 for a total of 55,550,755 square feet; and
- 45,700 buildings with a value less than the capital threshold of \$2,000,000 for a total of 67,740,456 square feet.

A land management agency with an environmental stewardship mission, DOI has a diverse building inventory of over 48,000 buildings. DOI buildings range from large urban offices to remote visitor centers to unique, remote facilities not traditionally targeted by the sustainable buildings movement. DOI's eight Bureaus have separate budgets, individual management cultures, and individual congressionally mandated missions. DOI's Bureaus are: Bureau of Indian Affairs (BIA), Bureau of Land Management (BLM), Bureau of Reclamation (BOR), Fish and Wildlife Service (FWS), National Park Service (NPS), Minerals Management Service (MMS), Office of Surface Mining Reclamation and Enforcement (OSM), and U. S. Geological Survey (USGS).

1.4 DOI Sustainable Buildings Target

By 2015, DOI will incorporate the Guiding Principles in at least 8,332,613 square feet of its owned and leased building inventory. 8,332,613 square feet is 15% of the 55,550,755 square feet above the capital asset threshold \$2,000,000.

1.5 Definitions

Buildings. Buildings are a facility on a space of land, covered by a roof, enclosed by walls, and usually with flooring. Buildings are a category in the Federal Real Property Profile data. The buildings category is the only category counted in the building inventory.

Building Inventory. DOI's owned and delegated lease building inventory is the building category of the Federal Real Property Profile data. The building inventory, by definition, does not include lands and structures. The building inventory, also by definition, does not include uncompleted new construction and major renovation projects as they are not included in the Federal Real Property Profile data.

Capital Asset Threshold. The Capital Asset Threshold for DOI Sustainable Buildings is a Current Replacement Value of \$2,000,000 or greater.

Capital Planning and Investment Control (CPIC). CPIC is a systematic approach to selecting, managing, and evaluating information technology investments. CPIC is mandated by the Clinger Cohen Act of 1996 which requires federal agencies to focus more on the results achieved through IT investments while streamlining the federal IT procurement process. The Office of Management and Budget and the DOI Office of Acquisition and Property Management release CPIC guidance, including the OMB Circular A-11, Part 7, section 300 form.

Current Replacement Value (CRV). CRV is the standard industry cost and engineering estimate of materials, supplies, and labor required to replace a facility at its existing size and functional capability, and to meet current regulatory codes.

Existing Buildings. Existing Buildings are buildings in the DOI building inventory.

Facility. A facility is an item of Real Property and may be a building, structure, utility system, or land. Each real property asset is assigned a facility number. Facilities are reported in the real property inventory with appropriate unit of measures, costs and other pertinent data.

The Federal Real Property Profile (FRPP). The FRPP is the single, comprehensive, and descriptive database of all real property under the custody and control of all executive branch agencies, except when otherwise required for reasons of national security.

Gross Construction Costs. Gross Construction Costs include net construction (the construction contract amount), design contingencies, and construction supervision.

Guiding Principles. The Guiding Principles for Federal Leadership in High Performance and Sustainable Buildings (Guiding Principles) are:

1. Employment of integrated design principles;
2. Optimization of energy efficiency and use of renewable energy;
3. Protection and conservation of water;
4. Enhancement of indoor environmental quality; and
5. Reduction of environmental impacts of materials.

The Guiding Principles were established in the 2006 Federal Leadership in High Performance and Sustainable Buildings Memorandum of Understanding, which was codified by E.O.13423.

Land. Land owned by the DOI or under the custody and accountability of DOI is captured in the FRPP. This includes land acquired by purchase, condemnation, and donation, transfer or other means as described in DOI acquisition of real property and interests procedures. Land is NOT included in DOI's building inventory.

Life cycle cost. The sum of the present values of capital, installation, operation, maintenance, and disposal costs over the lifetime of the project.

Life-cycle cost-effective. The life-cycle costs of a project estimated to be equal to or less than the standard practice.

Major Renovation Project. A major renovation project is a building project with net construction costs of \$2,000,000 or greater. A major renovation project triggers a DOI Capital Planning Investment Control (CPIC) review.

New Construction and Major Renovation Projects. Building Projects with a gross construction cost of greater than \$2,000,000.

Net Construction Costs. Net Construction Costs are the construction contract amount.

Structures. Structures are those facilities classified as other than land, building, or utility system. Examples of structures are: bridges, waterfront improvements, fences, flagpoles, swimming pools, towers, tent frames and floors, hutments, historical monuments, permanent grandstands and bleachers, sidewalks, and parking lots. Structures are NOT included in DOI's building inventory.

Sustainable Buildings. Buildings that incorporate the Guiding Principles.

Sustainable Building Rating System. Sustainable building rating system are developed by an American National Standards Institute (ANSI) accredited standards developer, for example the Leadership in Energy and Environmental Design certification developed by the US Green Building Council, or the Green Globes certification developed by the Green Building Institute.

Sustainable Building Rating System Certification. To be certified by a sustainable building rating system the building must “get the piece of paper” from the standards developer that says that building meets of the rating system requirements. If necessary, the building construction budget must pay for the certification.

2.0 ROLES AND RESPONSIBILITIES

2.1 Assistant Secretary for Policy, Management, and Budget (AS-PMB)

- Serves as DOI Senior Official responsible for implementing E.O. 13423;
- Provides Departmental leadership for sustainable buildings principles and practices;
- Assures that DOI meets the sustainability targets, milestones, and initiatives contained in this DOI Plan; and
- Establishes the DOI Sustainable Buildings Implementation Team (DOI Team) which includes representatives from each Bureau having direct knowledge and experience with the procurement of leased space and the design, construction, operation and maintenance of buildings. This could include procurement, legal, budget, facility and energy management, vehicle fleet management, environmental management, and technical support. Duties of this Team are described below in section 2.5.

2.2 Director, Office of Environmental Policy and Compliance (OEPC)

- Oversees implementation of this DOI Plan;
- Routinely updates this DOI Plan for continual improvement;
- Issues sustainable buildings policies and guidance;
- Coordinates DOI sustainable buildings programs and goals with other relevant management programs, directives, initiatives, and councils, (e.g., Asset Management Plans and Environmental Management Systems Policy);
- Prepares performance reports on DOI’s progress toward meeting the goals of E.O. 13423 and this DOI Plan;
- Coordinates the submission to OMB on DOI's progress toward meeting the goals of E.O. 13423 and this DOI Plan through the Environmental Stewardship Scorecard;
- Chairs the DOI Sustainable Buildings Implementation Team;
- Represents the Department on interagency committees and working groups on sustainable buildings;
- Maintains a sustainable building inventory; and
- Requests that OMB exempt specific buildings that cannot meet the Guiding Principles from the DOI building inventory when calculating progress toward the 15% goal by 2015.

2.3 Director, Office of Acquisition and Property Management (PAM)

- Coordinates Capital Planning and Investment Control (CPIC) guidance, and project review process;
- Ensures compliance with OMB Circular A-11, Part 7, on capital programming and developing business cases (section 300) in advance of funding requests for all major projects;
- Issues CPIC policy;
- Manages and oversees disposal of unneeded real property assets;
- Issues leasing policy and guidance for sustainable buildings requirements;
- Issues building energy management policy and guidance;
- Manages the Federal Real Property Profile data;
- Maintains a current inventory of all buildings;
- Participates on the DOI Sustainable Buildings Implementation Team;
- Issues the DOI Asset Management Plan; and
- Chairs the Asset Management Partnership.

2.4 Heads of Bureaus and Offices

- Meets the milestones outlined in this DOI Plan;
- Implements the Department's sustainable buildings goals as outlined in this DOI Plan;
- Designates a Bureau representative for the Departmental Sustainable Buildings Implementation Team;
- Establishes a Bureau Sustainable Buildings Implementation Team which includes representatives from the contracting, environmental, engineering, and asset management functions in each Bureau. Expertise in the following relevant areas may also be included: legal, real property, sustainability, environmental management, energy management, safety and maintenance/facility management;
- Assures that the Bureau meets the sustainability targets, milestones, and initiatives contained in this DOI Plan and the Bureau's Plan;
- Ensures Bureau compliance with DOI CPIC policy
- Ensures that all new or major renovation projects with a value greater than \$2,000,000 are designed and constructed to meet the requirements of E.O. 13423;
- Ensures accuracy of the Bureau Federal Real Property Profile;
- Disposes of unneeded real property assets;
- Develops strategies, action plans, and policies that ensure the Bureau meets or exceeds statutory goals and address the Guiding Principles;
- Ensures that appropriate Bureau personnel are trained in the sustainable buildings requirements of E.O. 13423, and this DOI Plan; and
- Submits an Annual Sustainability Report to OEPC.

2.5 DOI Sustainable Buildings Implementation Team

- Prepares a team charter;
- Develops a *Sustainable Buildings Operations and Maintenance Checklist (O&M Checklist)* that will be used by the Bureaus to move all DOI buildings and leases toward compliance

with the Guiding Principles. The *O&M Checklist* should contain a comprehensive list of sustainable O&M practices aligned with the Guiding Principles and provide a method for measuring the relative sustainability achieved in each building. Minimum sustainability thresholds will be established;

- Develops a *DOI Construction Checklist* that will be used by the Bureaus to ensure new and major renovations construction projects comply with the Guiding Principles. The *Construction Checklist* should contain a comprehensive list of sustainable design and construction practices aligned with the Guiding Principles and provide a method for measuring overall sustainability achieved in each project. Minimum sustainability thresholds will be established;
- Recommends strategies, action plans, and policies that ensure the Bureaus meet or exceed statutory goals and address the Guiding Principles;
- Seeks to identify and share sustainability-related lessons-learned, training opportunities or other items that may assist in improving or accelerating implementation of sustainable practices within DOI and the Bureaus;
- Conducts interdisciplinary gap analyses and incorporates E.O. 13423 and this DOI Plan requirements into department policies, criteria, contracts, training, and other guidance;
- Reviews and creates strategies and initiatives to address regional factors; and
- Reviews cases where buildings will have difficulty meeting the Guiding Principles, and recommends exemptions to the OEPC Director.

2.6 Bureau Sustainable Buildings Implementation Team

- Prepares a team charter;
- Prepares the Bureau's Sustainable Buildings Implementation Plan and existing building inventory;
- Utilizes the *O&M Checklist* to move existing buildings toward compliance with the Guiding Principles through O&M procedures and practices;
- Utilizes the *Construction Checklist* to ensure construction projects comply with the Guiding Principles;
- Coordinates Bureau sustainable buildings goals with other relevant management directives and initiatives;
- Seeks out, identifies and disperses information on training, best-practices or other items that may improve or accelerate sustainable practices within the Bureau;
- Recommends strategies and policies that will help the Bureau meet or exceed the requirements of E.O. 13423;
- Conducts interdisciplinary gap analyses and incorporates E.O. 13423 and this DOI Plan requirements into department policies, criteria, contracts, training, and other guidance; and
- Develops an approach for addressing regional factors and focus areas where initiatives can be adapted to local conditions.

3.0 SUSTAINABILITY PERFORMANCE AND ASSESSMENT

3.1 New Construction and Major Renovation Building Projects with a Current Replacement Value Greater Than \$2 million.

All new construction and major renovation building projects with gross construction cost greater than \$2,000,000 beginning design will meet the Guiding Principles and be certified by a sustainable building rating system. Appendix 5 relates sustainable building rating systems to requirements of the Guiding Principles. It outlines which requirements must be made mandatory to meet the Guiding Principles.

3.2 New Construction and Major Renovation Building Projects with a Current Replacement Value Between \$100K and \$2 million.

All new construction and major renovation building projects with gross construction cost between \$100K and \$2 million beginning design are encouraged to meet the Guiding Principles. To do so, new construction and major renovation projects will meet or exceed the minimum applicable score requirements established in the *DOI Construction Checklist*.

It is strongly encouraged, but not required, that new construction and major renovation projects be certified by a sustainable building rating system. Likewise, it is encouraged, but not required, that Bureaus use an independent third party not affiliated with the project or facility to complete the *Construction Checklist*. Such “pace setting” efforts will be recognized by Interior’s award programs.

The *Construction Checklist* will be developed by the DOI Sustainable Buildings Implementation Team per the milestones below. When finalized, it will be added as an appendix to this DOI Plan.

3.3 Existing Buildings.

All existing buildings above the sustainable buildings capital asset threshold (\$2,000,000 or greater) must use the *DOI Sustainable Buildings Operations and Maintenance Checklist (O&M Checklist)* to include the Guiding Principles into all DOI owned and leased buildings.

It is strongly encouraged, but not required, that buildings below the sustainable buildings capital asset threshold, \$2,000,000, use the *O&M Checklist*. Such “pace setting” efforts will be recognized by Interior’s award programs.

Use of the *O&M Checklist* must be coordinated with the organizational and facility level Environmental Management Systems to find efficiencies and avoid duplication.

The *O&M Checklist* will be developed by the DOI Sustainable Buildings Implementation Team per the milestones below. When finalized, it will be added as an appendix to this DOI Plan.

3.4 Leases.

All new building leases valued at \$2,000,000 or greater shall include a preference for buildings that meet the goals of the Guiding Principles in the selection criteria for acquiring leased buildings unless no such buildings are available or are available only at an increase of 10% price

per square foot or higher. When entering into leases for federal occupancy, including the renegotiation or extension of existing leases, DOI shall include criteria encouraging lease provisions that support the Guiding Principles. Build-to-suit lease solicitations shall incorporate criteria for sustainable design and development, energy efficiency, and verification of building performance in accordance with section 3.1, large construction, or section 3.2, construction, as applicable, of this DOI Plan.

Bureaus may use the Green Lease Solicitation Paragraph Reference Chart, the DOI *Construction Checklist*, the DOI *O&M Checklist*, and sustainable building rating systems to develop lease provisions that will meet the Guiding Principles.

In addition, DOI will comply with the Energy Independence and Security Act of 2007 stipulation that by FY 2011, no federal agency shall enter into a lease if space has not earned an ENERGY STAR label, unless no space is available that meets the functional needs of the agency; the agency remains in previously occupied space; space is of historical, architectural, or cultural significance; or the lease is for not more than 10,000 gross square feet.

It is strongly encouraged, but not required, that Bureaus work with their landlords to meet the Guiding Principles in currently leased space.

3.5 Measuring Sustainability of DOI's Building Inventory.

Annually, Bureaus will report data on the incorporation of the Guiding Principles into each building construction project *completed* during the reporting year to the Director of the Office of Environmental Policy and Compliance. Further instruction will be included in the requesting memo from the Director.

Annually, Bureaus will conduct a sustainability assessment and report progress toward including the Guiding Principles into their building inventories to the Director of the Office of Environmental Policy and Compliance. Further instruction will be included in the requesting memo from the Director.

Instructions for how to conduct the sustainability assessment will follow the release of OMB's Addendum for Existing Buildings.

Reporting on sustainable buildings must be coordinated with the Bureau's Environmental Management System programs to find efficiencies and avoid duplication.

4.0 REPORTING, RECOGNITION, AND COORDINATION

4.1 Reporting to the High Performance Federal Buildings Database.

Each Bureau shall report a success story with lessons learned for at least one building project per year, if applicable, into the High Performance Federal Buildings Database, www.eere.energy.gov/femp/highperformance/index.cfm. The Energy Star® rating of each facility's energy performance shall be included in each success story.

4.2 Sharing Best Practices and Providing Recognition.

DOI and Bureau Teams will encourage their respective organizations to apply for federal, DOI and Bureau awards programs so that they may be recognized for outstanding accomplishments. Examples of award programs include: the White House Closing the Circle Awards, the Federal Energy Management Program Awards, and the Department of the Interior Environmental Achievement Awards.

4.3 Capital Asset Planning and Investment Control.

Per E.O. 13423, all Capital Asset Plans (OMB Circular A-11, Part 7, Section 300) developed for major new building construction or renovations shall incorporate the Guiding Principles. DOI and Bureau Teams will work with their respective Capital Asset Planning and Investment Control (CPIC) Investment Review Boards (IRBs) to determine how to best achieve this mandate.

4.4 Bureau Sustainable Buildings Teams and Plans.

Bureaus must form Sustainable Buildings Teams. The Team will create or amend policy and goals, assessing and reporting progress, and taking corrective action to address shortfalls. Bureau Teams are cross functional teams responsible for decision-making directly related to the development and implementation of the Bureau's Sustainable Buildings Plan. This could include procurement, legal, budget, facility and energy management, vehicle fleet management, environmental management, and technical support.

Bureau Teams will create Bureau Sustainable Buildings Plans consistent with their Bureau's mission. Bureau Plans will implement this DOI Plan. Bureau Plans must be submitted to OEPC and updated as needed.

Bureau Plans must coordinate with related management directives, initiatives and councils, such as Bureau Asset Management Plans and Environmental Management Systems.

The DOI Sustainable Buildings Implementation Team will create a Bureau Plan template that incorporates, at a minimum, the following required components:

- Inclusion of the DOI vision.
- Directions for use of the *O&M Checklist*.
- Directions for use of the *Construction Checklist*.
- Instructions for conducting a sustainability assessment of the existing buildings capital asset portfolio subject to the Executive Order, including identification of assets that meet the five Guiding Principles, to the greatest extent practicable.

- Specific sustainability performance targets for all buildings. This covers existing assets, new construction, renovation, and leases.
- Technical guidance or reference model data, examples or links that will instruct or guide users to helpful information on sustainable leases, O&M practices and facility design and construction. Examples might include: <http://www.wbdg.org/>, <http://www.buildinggreen.com/menus/>, and <http://www.energystar.gov/>, among others.
- An assessment of current policy, criteria, contracts, training, and other areas, identifying gaps in the agency's sustainable buildings program. The implementation plan shall prioritize and address any corrective actions.
- Identification of key, results-oriented action items including major milestones (achievable in 6 month increments) and responsible parties for completing the specified actions. Bureaus may opt to incorporate these milestones into the Bureau three-year timeline as a "sustainability" section or as part of the stand alone implementation plan.
- Prioritized series of initiatives to secure the greatest return on investment (both quantitative and qualitative).
- Approach for addressing regional factors and focus areas where initiatives can be adapted to local conditions.
- Compliance with OMB Circular A-11, Part 7, on capital programming and developing business cases (section 300) in advance of funding requests for all major projects.
- The Bureau's capital asset threshold and supporting information including application of the threshold to building assets.
- Summary information on the Bureau's owned and delegated lease inventory including:
 - Total number of building assets and the aggregate gross square footage associated with the buildings.
 - Total number of buildings above the capital threshold and the aggregate gross square footage associated with those buildings.
 - Total number of buildings below the capital threshold and the aggregate gross square footage associated with those buildings.

5.0 MILESTONES

1. **Completed March 2007** – Assistant Secretary for Policy, Management and Budget established a Departmental Sustainable Buildings Implementation Team.
2. **Completed December 2007** – Each Bureau completed the Existing Building Inventory in the Federal Real Property Profile.
3. **Completed April 2008** – DOI Sustainable Buildings Implementation Team created the DOI Sustainable Buildings Implementation Plan.
4. **Completed April 2008** – DOI Sustainable Buildings Implementation Team created a *Guiding Principles Crosswalk to LEED and Green Globes Criteria*.
5. **Completed June 2008** – DOI submits final DOI Sustainable Buildings Implementation Plan to the Office of Management and Budget.

6. **Quarter 4, FY 2008** – Each Bureau will establish a Bureau Sustainable Buildings Team. The Bureau Teams’ responsibilities are described in Section 2.6 above.
7. **Quarter 4, FY 2008** – DOI Sustainable Buildings Implementation Team will create a Bureau Plan Template.
8. **Quarter 4, FY 2008** – DOI Sustainable Buildings Implementation Team will determine if the DOI space management community would like the SBWG to develop a *Green Lease Checklist* similar to or building from the General Services Administration Realty Services Letter on Green Lease Policies and Procedures for Lease Acquisition dated December 27, 2007, the *DOI Construction Checklist* or *DOI O&M Checklist* as an aid for incorporating the Guiding Principles into new leases.
9. **Quarter 1, FY 2009** – The DOI will issue the *Construction Checklist* to the Bureaus.
10. **Quarter 2, FY 2009** – Bureaus will complete and submit to DOI their Bureau Plans.
11. **Quarter 1, FY 2009** -- DOI Plan updated and submitted to OMB.
12. **Quarter 1, FY 2009** – Each Bureau will complete the Existing Building Inventory in the Federal Real Property Profile.
13. **Six Months After OMB issues High Performance and Sustainable Building Guidance** – DOI will conduct a gap analysis and start revising policy and guidance, as needed, to incorporate the Guiding Principles into DOI’s building inventory. The gap analysis will include review of regional factors and opportunities for DOI-wide initiatives.
14. **Six Months After OMB issues the Addendum for Existing Buildings** – DOI will issue the *O&M Checklist* to the Bureaus.
15. **Three Months After DOI issues the *O&M Checklist*** – DOI Sustainable Buildings Implementation Team will issue instructions for a sustainability assessment. DOI will issue an official sustainability assessment data call. Or, DOI will comply with an OMB sustainability assessment data call per the FRPP, whichever comes first.
16. **Six Months After DOI issues sustainability assessment data call or complies with an OMB FRPP data call, whichever comes first** – Bureaus will complete at least 25% their survey and computed baseline information on the sustainability of existing buildings including leases. DOI will request, and Bureaus will provide, an annual report to DOI on the sustainability achievements for that fiscal year. The report will include information on new building construction, leases and existing buildings sustainability.